

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT PIERCE DIVISION

ALEKSEY TOVARIAN,

Plaintiff,

Case No. 2:24-cv-14037-AMC

v.

KATERYNA PANOVA, *et ano.*,

Defendants.

DECLARATION OF JAMES M. SLATER

I, James M. Slater, declare as follows:

1. My name is James M. Slater, and I am counsel for Defendants Kateryna Panova and Rubic, LLC. I am over the age of 18, and I have personal knowledge of the facts set forth in this declaration.

2. The purpose of this declaration is to annex certain documents and records in connection with Defendants' Motion to Dismiss.

3. Attached as Exhibit 1 hereto is a true and correct copy of a certified translation of the Rubic article referenced in Plaintiff's Complaint and found at the following link:

<https://rubic.us/otzyvy-o-teachbk-moshenniki-prodayut-kradennye-mashiny-shantazhiruyut/>.

4. On February 7, 2024, I ran a search in the TeachBK YouTube channel located at <https://www.youtube.com/@TeachBK> (the "TeachBK Channel") for the name Tovarian in Russian as "товарян."

5. Attached as Exhibit 2 hereto is a true and correct copy of the videos that populated on the TeachBK Channel using the search term above.

6. Also on February 7, 2024, I captured a screenshot of the landing page of TeachBK channel which is embedded in the “Introduction and Background” section of the Motion to Dismiss. The screenshot is a true and correct copy of the TeachBK Channel landing page on that date.

7. On that same date, I clicked on the featured video on the TeachBK Channel landing page and took a screenshot of that video at timestamp 1:25. The screenshot embedded in the Motion to Dismiss below the screenshot of the TeachBK Channel landing page is a true and correct copy of the featured video stopped at one minute and 25 seconds.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 9, 2024 at Atlanta, Georgia.

A handwritten signature in black ink, appearing to read 'James M. Slater', is written over a horizontal line.

James M. Slater